

Zagga's Privacy Policy

Date Updated: 10 November 2025

Purpose

To describe when Zagga collects personal information, what it is used for, to whom it is disclosed, and to ensure that Zagga complies with its obligations under the Privacy Act 1993.

Policy

This policy covers the following topics;

1. The information Zagga collects and when
2. How Zagga uses the information
3. Sharing of information
4. Storage and protection of personal information
5. Accessing and correction of personal information
6. Internet use
7. Security of captured data
8. Changes to the privacy policy

1. The information Zagga collects and when

Zagga collects personal information from investors and borrowers who use the Zagga platform.

Additional personal information is collected by Zagga from third parties in relation to identity verification, financial credit checks, Company Office checks, online checks (through search engines), and background and legal checks as deemed appropriate.

2. Website availability

The personal information collected is used:

- to check user identities to satisfy Zagga's obligations under its Fraud & Anti Money Laundering and Fair Dealing policies;
- in the loan application decision making process to facilitate approval and publication of a loan application or otherwise;

- to calculate credit assessment scores for borrowers;
- to inform the investors' trustee in the preparation and issue of loan documentation;²
- to carry out any activity in connection with any legal, governmental or regulatory requirement, or in connection with legal proceedings, crime or fraud prevention, detection or prosecution; and
- for general administrative and business purposes.

3. Sharing of information

Zagga will only publish generic information about borrowers and loan applications on the public pages of its website. Zagga will under no circumstances, sell or receive payment for licencing or disclosing personal information held. More detailed information about borrowers and loan applications will only be disclosed to:

- Investors, borrowers and their solicitors who are directly involved in a particular loan application. Non-disclosure declarations are read and agreed to by Investors prior to the release of detailed information about the borrower or loan application;
- Credit reference agencies (unless we have agreed otherwise) who may share the information with other organisations and who may keep a record of the searches made against the borrowers name;
- Anyone who hosts or maintains data centers, service platforms and other infrastructure and systems where information is processed or stored on behalf of Zagga;
- Any person or organisation Zagga may be required to pass information onto by reason of legal, governmental or regulatory authority including law enforcement agencies;
- Any person or organisation as authorised by the Privacy Act 1993; and
- Any person as necessary to protect or enforce Zagga's legal rights and interests, or to defend any claims made against it.

4. Storage and protection of personal information

Where Zagga stores or records personal information, all reasonable steps will be taken to keep such information:

- secure and to prevent unauthorised disclosure, and

- accurate and up to date.

5. Access and correction of personal information

Every user of the platform will have online access to their personal registration information and may change such information themselves or request correction of the details held by contacting Zagga (such amendments may need to be validated by Zagga).

- Zagga will take all reasonable steps to correct its information so that it is accurate, complete and current.
- Zagga will delete any personal information when it is no longer required for the purpose for which it was collected.

6. Internet Use

Cookies are small pieces of information which can be stored on a hard drive (persistent cookies) or in memory (session cookies). Zagga cookies stored to a user's computer cannot read the hard drive or command the computer to perform any action.

7. Security of captured data

To prevent unauthorised access, maintain data integrity and ensure appropriate use of any customer information collected, Zagga will put in place physical, electronic and managerial processes to protect the information collected.

- Zagga's system will store data in an encryption protected environment;
- Zagga will contract an independent internet security specialist to conduct regular vulnerability and penetration testing; and
- Zagga will regularly review all aspects of data security in respect of the advice received from the security specialists.

8. Changes to Zagga Privacy Policy

Any changes to this policy will be advertised on the Zagga website and be effective from the date posted on the website.